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STATE OF NEW JERSEY  
DIVISION OF GAMING ENFORCEMENT  
DOCKET NO. 12-0730-VC

STATE OF NEW JERSEY, DEPARTMENT	)	
OF LAW AND PUBLIC SAFETY,	)	
DIVISION OF GAMING ENFORCEMENT,	)	
	)	
Complainant,	)	Civil Action
	)	
v.	)	COMPLAINT
	)	
SHOWBOAT ATLANTIC CITY	)	
OPERATING COMPANY, d/b/a	)	
SHOWBOAT CASINO HOTEL,	)	
	)	
Respondent.	)	
	)	
	)	

Complainant, State of New Jersey, Department of Law and Public Safety,  
Division of Gaming Enforcement (hereinafter "Division"), located at 1300 Atlantic  
Avenue, Atlantic City, New Jersey, 08401 says:

**COUNT I**  
**(Rules of the Game)**

1. Respondent, Showboat Atlantic City Operating Company, LLC, d/b/a Showboat Casino Hotel ("Showboat") is a New Jersey enterprise having its principal place of business at 801 Boardwalk, Atlantic City, New Jersey 08401.

2. Showboat is the holder of a casino license first issued by the Casino Control Commission on April 2, 2012 and continuously renewed thereafter. At all times relevant herein, Showboat was authorized to conduct casino gaming within its casino hotel facility.

3. The rules of the game of poker at N.J.A.C. 13:69F-14.6(e) provide, in pertinent part, that:

(e) The following procedures shall be utilized by the dealer when dealing the game of poker:

...

4. The dealer shall be required to count the entire deck of cards at least once every 15 minutes in order to determine that 52 cards are present; provided, however, that the dealer may count the stub in the games of hold'em and omaha poker."

4. N.J.A.C. 13:69E-1.17(a) provides, in pertinent part, that "[c]ards used to play authorized table games shall be in decks of 52 cards."

5. N.J.A.C. 13:69E-1.17(c) states in pertinent part that “[e]ach suit [ within a deck of cards] shall be composed of 13 cards: ace, king, queen, jack, 10 nine, eight, seven, six, five, four, three, and two.

6. N.J.A.C. 13:69D-1.3(b) states in pertinent part that “[e]ach casino licensee shall conduct gaming operations in a manner consistent with their internal controls.”

7. On February 14, 2012 the Division sent a warning letter to Showboat identifying three separate prior occasions where Showboat personnel failed to check cards used in the game of poker. Those occasions were on July 9, 15, and 16 of 2011. In each incident a card was found missing from the decks and the dealers failed to check the cards for a minimum one hour and twenty-five minutes.

8. Showboat’s established card checking procedures require that when an authorized game is being conducted, without the use of a shuffle machine, the dealer must check the amount of cards contained within the deck a minimum of three times per half hour. Those procedures further state that the cards must be checked when the dealer arrives at the table before dealing a hand, half way through the half hour of play and just before being relieved from the game.

9. On or about April 23, 2012, Showboat conducted a poker tournament in it’s poker room. During that tournament players began to play poker at

table 619 at approximately 2:00 p.m.

10. During the tournament referred to in Paragraph 7 two decks of cards where used, one of which had a red pattern on the back of the cards. The red deck of cards was spread out face up on the table prior to the start of the game and was first put into play at approximately 2:31 p.m.

11. The red deck of cards remained in play at poker table 619 until approximately 3:00 p.m. At no point in time during the period of time that the red deck of cards were in play between 2:31 p.m. and 3:00 p.m. did the dealer check the cards as required by Showboat's own procedures and N.J.A.C. 13:69F-14.6(e).

12. At approximately 3:00p.m. the red deck of cards was removed from play by the dealer and placed into the table inventory while another deck was utilized. When the new deck was entered into play the dealer failed to check that deck as required by Showboats own procedures and N.J.A.C. 13:69F-14.6(e).

13. At approximately 3:30 p.m. a dealer checks the red deck of cards and discovers that the "8 of spades" is missing from the deck.

14. Based upon the information in Paragraphs 1 through 12, of this Complaint, Showboat failed to follow proper procedures when conducting the game of poker, in violation of N.J.A.C. 13:69F-14.6(e) and N.J.A.C. 13:69D1.3(b).

WHEREFORE, Complainant demands the following relief against Respondent, Showboat:

A. Judgment that Showboat, failed to follow proper procedures when conducting the game of poker, in violation of N.J.A.C. 13:69F-14.6(e) and N.J.A.C. 13:69D-1.3(b);

B. Judgment imposing a civil monetary penalty, pursuant to N.J.S.A. 5:12-129(5), upon Showboat; and,

C. Judgment for such other and further relief as the Director may deem just and appropriate under the circumstances.

**Count 2**  
**(Game Supervision)**

15. The allegations of paragraphs 1 through 11 above are repeated, realleged and incorporated by reference herein.

16. N.J.A.C. 13:69D-1.12(a) provides, in pertinent part, that:

Each casino licensee shall employ the personnel herein described in the operation of its casino and casino simulcasting facility, subject to the limitations imposed by N.J.A.C. 13:69D-1.11(a).

1. Each casino licensee shall at all times ensure the proper operation and effective supervision of all authorized games and simulcast wagering in the casino and casino simulcasting facility.

17. By failing to insure that the dealers check the cards used at poker table 619 as required by Showboat's own procedures and N.J.A.C. 13:69F-14.6(e) Showboat table game personnel failed to effectively supervise the game of poker, in violation of N.J.A.C. 13:69D-1.12(a)

WHEREFORE, Complainant demands the following relief against Respondent, Showboat:

A. Judgment that Showboat, failed to effectively supervise the game of poker, in violation of N.J.A.C. 13:69D-1.12(a);

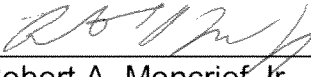
B. Judgment imposing a civil monetary penalty, pursuant to N.J.S.A. 5:12-129(5), upon Showboat; and,

C. Judgment for such other and further relief as the Director may deem just and appropriate under the circumstances.

Respectfully submitted,

**Jeffrey S. Cheisa**

Attorney General of New Jersey

By:   
Robert A. Moncrief Jr.  
Deputy Attorney General

Dated: 10/21/12

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